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June 19, 2018

**VIA ECF**

Honorable Katherine B. Forrest  
United States District Judge  
United States Courthouse  
500 Pearl Street, Room 2230  
New York, New York 10007-1312

Re: *Peterson v. Islamic Republic of Iran* 10-cv-4518 (KBF)

Dear Judge Forrest:

I am counsel for David J. Cook and Cook Collection Attorneys, P.L.C. (collectively "Cook"), and I am writing with respect to Your Honor's Opinion and Order entered yesterday, June 18, which "ADOPTS and CONFIRMS the [Special Master's] Report's top-line recommendation that the Court deny Cook's current attempt to intervene as untimely." Your Honor's Order has potential implications for the QSF Trustee and Cook that may lead to further proceedings. The Order also has implications for the attorneys against whom Cook is proceeding in arbitration, some of whom have relatively small percentage liability but may be subject to a potential joint and several judgment without the "protection" afforded by the existence of a fund from which the judgment can be satisfied.

As I informed Your Honor yesterday, the award will be issued on or before July 5, 2018. At that point, Cook's entitlement to a fee and the equities and remedies available to Cook will be clear. For that reason, and because Your Honor continues to have jurisdiction over the distribution of funds by the QSF Trust, I respectfully request that Your Honor allow Cook, the affected attorneys, and counsel for the QSF Trust to appear for a conference with the Court, either in person or telephonically, to discuss how the parties and the Trust will proceed in light of Your Honor's Order. I have spoken to Mr. Jacob, counsel for the QSF Trustee, and he has informed me that if such a conference is scheduled, and if it is appropriate for him to appear, he will not be able to appear before July 9.

Respectfully,

  
Max Folkenflik

MF/amf

cc: All Counsel on ECF Service List